

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**MAURA HENRY and others similarly  
situated,**

**Plaintiff,**

**v.**

**Civil Action No. 05-11244 RWZ**

**BOSTON CENTER FOR ADULT  
EDUCATION, INC., and RONALD  
BOCAGE, as President for the Boston  
Center for Adult Education and Individually,**

**Defendants.**

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

The parties believe that discovery should be conducted in fact and expert phases. The parties have agreed to and propose the following pre-trial schedule:

1. Fact discovery will be completed by January 27, 2006.
2. Plaintiff's expert disclosure will be completed by December 23, 2005.
3. Defendant's expert disclosure will be completed by January 17, 2006.
4. All expert depositions will be completed by February 27, 2006.
5. All dispositive motions will be filed by March 27, 2006.
6. Pretrial Conference will be held on or before May 2006.

**CERTIFICATION OF COUNSEL**

Pursuant to Local Rule 16.1(D)(3), the parties will submit separately executed certification affirming that it and its counsel have conferred regarding the costs of litigation and alternatives to litigation and have conferred regarding alternative dispute resolution.

**SETTLEMENT DEMAND**

Pursuant to Local Rule 16.1(c), the parties state that Plaintiff has not served a written settlement proposal upon the Defendant's counsel. The Defendant's counsel will confer with Defendant on the subject of settlement before the Scheduling Conference and will be prepared to respond to Plaintiff's settlement proposal, if any, at the Scheduling Conference.

**TRIAL BY MAGISTRATE**

Neither party consents to trial by Magistrate.

MAURA HENRY

BOSTON CENTER FOR ADULT  
EDUCATION and RONALD BOCAGE,

By Her Attorneys,

By Their Attorneys,

GORDON & BALIKIAN, LLP  
535 Boylston Street, 6<sup>th</sup> Floor  
Boston, Massachusetts 02116  
(617) 536-1801

MORGAN, BROWN & JOY, LLP  
200 State Street  
Boston, Massachusetts 02109  
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\_\_\_/s/ Ara J. Balikian\_\_\_\_\_  
Ara J. Balikian (BBO No. 630576)  
Kristen M. Hurley (BBO No. 658237)

\_\_\_/s/ Joseph P. McConnell\_\_\_\_\_  
Joseph P. McConnell (BBO No. 566412)

Date: July 20, 2005

Date: July 20, 2005